

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

In Re: JOHN G. WADSWORTH
Debtor

Case No. 17-17892 REF
Chapter 13

ORDER DENYING RELIEF FROM STAY

AND NOW, this day of 2018, in consideration of the
Motion of MTGLQ Investors, LP. for Relief from the Automatic Stay, and Debtor's response
thereto, it is hereby ORDERED, that the Motion be, and hereby is, DENIED.

BY THE COURT:

Bankruptcy Judge

Interested Parties:

William B. Callahan, Esquire
Law Offices of William B. Callahan
1800 East High Street, Suite 150
Pottstown, PA 19464

Frederick L. Reigle, Trustee
PO Box 4010
Reading, PA 19606

Kevin G. McDonald, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

In Re: JOHN G. WADSWORTH
Debtor

Case No. 17-17892 REF
Chapter 13

**DEBTOR'S ANSWER TO MOTION OF MTGLQ INVESTORS, L.P. FOR RELIEF
FROM THE AUTOMATIC STAY UNDER 11 U.S.C. §362(D) WITH RESPECT TO
PROPERTY: 526 HALLMAN ROAD, UNION TOWNSHIP, PA19518**

Debtor, John G. Wadsworth, by and through his Attorney, William B. Callahan, by way of Answer to the Motion for Stay Relief, filed by MTGLQ Investors, L.P., hereby says:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied as stated. Debtor has been ready, willing and able to make post-petition payments, but MTGLQ Investors, L.P.,’s agent, Shellpoint Mortgage Servicing, did not accept the payments. Debtor now stands ready to tender the full post-petition amount due, and is awaiting word from Shellpoint Mortgage Servicing as to the correct address to which the payment should be sent.
7. Denied. Movant should not be permitted to collect attorneys fees, because movant’s agent has caused the delay.
8. Denied as stated. Attorneys fees and costs should not be allowed.
9. Debtor lacks knowledge or information sufficient to admit or deny this allegation and leaves Movant to its proofs.
10. Denied. Movant is not entitled to relief from the stay.
11. Denied.

WHEREFORE, Debtor, John G. Wadsworth, prays this Honorable Court to enter an Order denying MTGLQ Investors LP's Motion for Stay Relief.

Respectfully submitted,

LAW OFFICES OF WILLIAM B. CALLAHAN

A handwritten signature in black ink, appearing to read 'WBC', followed by a long horizontal flourish.

/s/ William B. Callahan

William B. Callahan, Esquire
Law Offices of William B. Callahan
1800 East High Street, Suite 150
Pottstown, PA 19464
(484) 680-0552

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

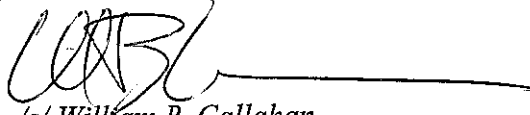
In Re: JOHN G. WADSWORTH
Debtor

Case No. 17-17892 REF
Chapter 13

**CERTIFICATION OF SERVICE OF DEBTOR'S ANSWER TO
MOTION OF MTGLQ INVESTORS, L.P. FOR RELIEFFROM THE
AUTOMATIC STAY UNDER 11 U.S.C. §362(D) WITH RESPECT TO PROPERTY:
526 HALLMAN ROAD, UNION TOWNSHIP, PA19518**

William B. Callahan, Esquire certifies that a true and correct copy of the Debtor's Answer to the Motion of MTGLQ Investors, L.P. for Stay Relief was sent this date by first class mail, postage prepaid and/or electronic mail to the parties listed below

Date: May 16, 2018



/s/ William B. Callahan
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